

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 1:21-bk-00119-HWV</b>
<b>Andrew W. Lentz</b>	:	<b>Chapter 13</b>
<b>Debrah L Lentz</b>	:	<b>Judge Henry W. Van Eck</b>
	:	<b>*****</b>
<b>Debtor(s)</b>	:	
	:	
<b>U.S. Bank National Association</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>Andrew W. Lentz</b>	:	
<b>Debrah L Lentz</b>	:	
<b>Jack N Zaharopoulos, Trustee</b>	:	
<b>Respondents</b>	:	

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION TO CONFIRMATION OF  
THE AMENDED PLAN (DOCKET NUMBER 45)**

U.S. Bank National Association ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed First Amended Chapter 13 Plan ("Plan") filed by Andrew W. Lentz and Debrah L Lentz (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a lien on Debtor's personal property commonly known as a 2019 Porcshe Cayenne with the Vehicle Identification Number WP1AE2AY4KDA50528 ("Property").
2. Creditor has filed Proof of Claim number 9 in the amount of \$104,851.15 with a fixed interest rate of 6.69%.
3. Debtor's Plan seeks to improperly cramdown Creditor's lien to a secured value of \$104,663.02 at an interest rate of 0%.
4. Debtor purchased the Property within the 910-day period preceding the date of the filing of the bankruptcy petition and cannot be crammed down pursuant to 11 USC § 1325.

21-004150\_JDD1

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

Alyk L. Oflazian (312912)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

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Attorneys for Creditor

The case attorney for this file is Adam B. Hall.

Contact email is abh@manleydeas.com

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<b>Debtor(s)</b>	:	
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<b>U.S. Bank National Association</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>Andrew W. Lentz</b>	:	
<b>Debrah L Lentz</b>	:	
<b>Jack N Zaharopoulos, Trustee</b>	:	
<b>Respondents</b>	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of U.S. Bank National Association to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Chapter 13 Trustee, Standing Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036, info@pamd13trustee.com

Michael John Csonka, Attorney for Andrew W. Lentz and Debrah L Lentz, Csonka Law, 166 South Main Street, Kerrstown Square, Chambersburg, PA 17201, office@sonkalaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on November 15, 2021:

Andrew W. Lentz and Debrah L Lentz, 2033 Parkview Ave, Red Lion, PA 17356

DATE: 11/15/2021

/s/ Adam B. Hall

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Adam B. Hall, Esquire (323867)

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